

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**FREE SPEECH SYSTEMS, LLC,**

**DEBTOR.**

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**Case No. 22-60043**

**Chapter 11 (Subchapter V)**

**ORDER APPROVING DEBTOR'S APPLICATION  
TO EMPLOY PATTIS & SMITH LLC UNDER 11 U.S.C. § 327(e) AND 328(a),  
AS SPECIAL COUNSEL, NUNC PRO TUNC AUGUST 1, 2022**

Upon the application (the "Application")<sup>1</sup> filed by the Debtor to retain and employ Pattis & Smith LLC ("P&SLLC") pursuant to Bankruptcy Code §§ 327(e), 328(a) and 330 and Bankruptcy Local Rule 2014-1, as more fully set forth in the Application and all exhibits and attachments to the Application; and upon the Court's finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (iii) venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (iv) the Application and the Pattis Declaration are in full compliance with all applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and Orders and procedures of this Court; (v) P&SLLC does not represent an interest adverse to the Debtor's estate with respect to the matters upon which it is to be engaged; (vi) P&SLLC is qualified to represent the Debtor's estate under § 327(e) of the Bankruptcy Code; (vii) the terms of P&SLLC's employment have been disclosed and are reasonable under the circumstances under § 328(a) of the Bankruptcy Code; (viii) proper and adequate notice of the Application, the deadline to file any objections to the

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<sup>1</sup> Capitalized terms not defined herein have the meaning set forth in the Application.

Application, and the hearing thereon was given, and no other or further notice is necessary; (ix) the legal and factual bases set forth in the Application establish just cause for the relief granted herein; (x) the relief sought in the Application is in the best interest of the Debtor's estate; (xi) any timely objection to the Application having been withdrawn or overruled for the reasons stated on the record at the hearing on the Application; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. In accordance with Bankruptcy Code §§ 327(e) and 328(a) and Bankruptcy Local Rule 2014-1, the Debtor is authorized to employ and retain P&SLLC commencing on August 1, 2022, as special counsel, under the terms and conditions set forth in the Application, the Engagement Letter attached to the Application as Exhibit B and this Order.

2. P&SLLC is authorized to perform the Professional Services for the Debtor that are necessary or appropriate in connection with serving as special counsel in connection with the Sandy Hook Lawsuits.

3. P&SLLC shall be compensated for its services and reimbursed for related expenses in accordance with the terms and conditions of the Engagement Agreement, as set forth in the Application and subject to the procedures Bankruptcy Code §§ 328(a), 330 and 331 of the Bankruptcy Code, and in accordance with applicable Federal Rules of Bankruptcy Procedure, Local Rules, and any orders of this Court.

4. This order shall be immediately effective and enforceable upon entry.

5. This order, and all acts taken in furtherance or reliance thereon, shall be effective notwithstanding any objection until further order of this Court.

6. Notwithstanding anything to the contrary in the Application, the Engagement Agreement, or the Declaration attached to the Application, P&SLLC shall not be entitled to

reimbursement of expenses or fees from the Debtor in connection with any objection to its fees, without further order of the Court.

7. P&SLLC will review its files periodically during the pendency of this Chapter 11 Case to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, P&SLLC will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration as required by FED. R. BANKR. P. 2014(a).

8. To the extent that any of the Application, the Pattis Declaration, or the Engagement Agreement are inconsistent with this Order, the terms of the Order shall govern.

9. The Debtor and P&SLLC are authorized to take all actions necessary to effectuate the relief granted pursuant to this order in accordance with the Application.

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this order.

Dated: \_\_\_\_\_, 2022

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**UNITED STATES BANKRUPTCY JUDGE**